

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

ZDENEK BAKALA,

Plaintiff,

v.

PAVOL KRUPA, ADAM SWART, AND
CROWDS ON DEMAND,

Defendants

Case No. 9:18-cv-02590-DCN

**COMPLETION OF THE REPLY TO THE
ACTION**

**DETERMINATION OF ADDRESS FOR
SERVICE**

1. Pavol Krúpa completes the response to the action and determines the address for service.
2. I, the undersigned, Pavol Krúpa, declare on my honor that I am a citizen of the Slovak Republic, residing in the Slovak Republic and habitually and permanently residing in the Czech Republic.
3. I, the undersigned, Pavol Krúpa, declare on my honor that I have never been a resident of the United States, I do not own or have owned real estate in the United States, I have never been in business in the United States, I have never been to South Carolina.
4. I, the undersigned, Pavol Krúpa, declare on my honor that I do not know Zdeněk Bakala personally, I have never met him, I do not know who his lawyer is.
5. I, the undersigned, Pavol Krúpa, reject and deny all allegations against me in the lawsuit, I have never even organized any of the proceedings described in the lawsuit, I only heard about Adam Swart's actions from the media and social networks, I have no information on the described conduct of other defendants and therefore I can not comment on them.

6. I reiterate that this is the second attempt by Zdeněk Bakala to harm me when he failed for the first time in a court in Switzerland.
7. I repeat that Zdeněk Bakala brought an action against me only to reduce my dignity in the Czech Republic as a person recognized by the President of the Republic and only to cause me harm. I emphasize that Zdeněk Bakala is abusing the jurisdiction of foreign courts to incur huge costs of legal aid, translations of documents into foreign languages. I draw attention to the fundamental decision of the German Federal Court of Justice dated October 17th 2019, which held that the defendant was entitled to reimbursement of the costs he incurred in resisting an action brought in a US court contrary to the defendant's jurisdiction.
8. I reiterate that I am not subject to the jurisdiction of the South Carolina Court, and I am not subject to US law.
9. I repeat that Zdeněk Bakala is not habitually resident in South Carolina, he is staying in the USA because of his home reconstruction in Switzerland and because of imminent criminal prosecution in the Czech Republic according to the conclusions of the Parliamentary Commission of Czech Republic.
10. Pavol Krúpa informs that, because of the continuous violation of the Hague Convention and the International Convention for the Protection of Human Rights and Freedoms, he drew attention to the procedures of the Ministry of Justice and asked the Ministry of Justice for assistance to end human rights violations.
11. Mr Krúpa applied for the service of judicial and other documents to be served by the Ministry of Justice of the Czech Republic, Vyšehradská 427/16, Prague, Czech Republic.
12. Pavol Krúpa sets out the conclusions of the Parliamentary Commission report on 8 October 2019:

Page 2 - Bakala has become symbol of economic savoury on behalf of public and synonym for liar and gangster Page 3 - Witness Mr. Bakala denied to fulfil his duty as witness so Parliamentary Commission(PC) asked Police of Czech Republic to get him to the hearing. PC suggests that Mr. Bakala acts inappropriate and arrogant towards the country where he obtained most of his wealth. Bakala was at that time outside of Czech Republic so Police did not get him for hearing as they cannot act in other countries.

Page 13 - companies which Mr. Bakala controlled directly or indirectly, made billions of Czech crowns on behalf of Czech Republic

Page 18 - PC suggests that criminal fraud and damage to foreign law occurred when Bakala's associates including lawyers claim false information.

Second document in the attachement

Page 12-13

Zdenek Bakala according to PC may have been leader of organized group who got rich on behalf of Czech Republic. Based on the opinion of PC, Bakala as an accomplice has made fraud based on paragraph 250 section 4 of criminal law. Bakala was linked to many people and law firm, namely Kolacek, Otava and Bakala acted as an organised group. In this matter PC, cannot exclude any other wrongdoings by this group. Company Karbon Invest was managed at that time by other person than Bakala. Based on his knowledge about Karbon Invest, he has obligation to report any wrongdoing to the court. By not doing anything, he broke another criminal law based on paragraph 167 section 1 of criminal law in Czech Republic.

Sincerely,

Pavol Krupa

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[signature]

